

Case Vander Eyk Dairy

Arthur Neal
National Organic Standards Board
Room 4008 – South Building
1400 Independence Avenue, SW
Washington, DC 20250-0020

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Re: Non-support of NOSB's recommendation for rule change

Dear Mr. Neal

I am the owner of family dairy located in Pixley, California. As a fifth generation dairy, we have been certified organic since 1999 and I have been raising dairy cattle on native pastures for over twenty years, as did my father and his father.

With all due respect, the NOSB guidance draft for a rule change is simply not fair because there is no "level playing field" for dairy producers. Extreme differences in geographical locations and weather patterns have a geographic bias in the proposed recommendation. An organic dairy in Arizona, that has pasture available for only a few months but is able to free range cows on dry lots for twelve months of the year, would have their certification terminated under the NOSB recommendations. However, an organic dairy in Minnesota that houses their cows in close confinement for up to eight months at a time with four months of pasturing would be certified. In this situation, the Arizona dairy clearly treats their cows more humanely but is decertified by the proposed regulations.

I am also concerned that if the NOSB recommendations are adopted, a significant number of organic dairy farmers in the Western States will be out of compliance and, therefore, forced out business. This could cause a permanent disruption of the organic milk supply, with the consumer paying a much higher price for organic milk. While I believe in the principles of sustainable agriculture and the humane treatment of dairy cattle, we need to remember that without the consumer buying our product, we would end-up with nothing.

In summation, it seems to me that more research needs to be conducted at this time on dairy cattle welfare with regards to pasturing. I am confident there are standards that are both humane for livestock and fair for the producer that can be developed.

Sincerely Yours



Case Vander Eyk.